

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

THE BAVARIAN, A CONDOMINIUM, a
Washington non-profit corporation,

Plaintiff,

v.

COUNTRY MUTUAL INSURANCE
COMPANY, an Illinois Corporation; and DOE
INSURANCE COMPANIES 1–10,

Defendants.

NO. 2:25-cv-00493-JHC

STIPULATED MOTION TO EXTEND
INITIAL SCHEDULING DATES & ORDER

I. MOTION

Come now, Plaintiff The Bavarian, a Condominium (“Association”) and Defendant Country Mutual Insurance Company (“Country Mutual”), by and through their respective counsel, and stipulate to this Motion to Extend Initial Scheduling Dates as set forth in the Court’s Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. #4). The Association filed its Complaint and Summons on March 19, 2025. The Summons was issued by the Court on May 15, 2025 (Dkt. 5). Service was then effected on Defendant Country Mutual on May 23, 2025, via the Washington State Office of the Insurance Commissioner. Counsel for Defendant has appeared.

Counsel for the Association and Country Mutual have met and conferred and propose a forty-five-day extension of the Deadlines for the FRCP 26(f) Conference, Initial Disclosures

Pursuant to FRCP 26(a)(1), and Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f). The new proposed deadlines are set forth below:

	New Proposed Deadline
Deadline for FRCP 26(f) Conference	07/03/2025
Initial Disclosures Pursuant to FRCP 26(a)(1)	07/18/2025
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	07/25/2025

II. GOOD CAUSE SHOWN

Pursuant to LR 16(b)(6) a scheduling order may be modified “only for good cause and with the judge’s consent.” Good cause exists here because the Summons in this matter, which was contemporaneously filed with Complaint, was first issued by the Court on May 15, 2025 and thus the Association was only able to recently serve Country. No previous extensions of time in regard to the scheduling order have been requested or granted by this Court, and this extension is not made for purposes of delay, but rather to permit Country time to respond to the lawsuit and for the parties to have the ability to meaningfully participate in the Fed. R. Civ. P. 26(f) conference, prepare and exchange initial disclosures, and together draft and approve a Joint Status Report.

The parties respectfully request that the Court extend the currently scheduled deadlines as set forth above. A proposed order is included herewith.

STEIN, SUDWEEKS & STEIN, PLLC

/s/ Jerry H. Stein

/s/ Justin D. Sudweeks

/s/ Daniel J. Stein

Jerry H. Stein, WSBA #27721

Justin D. Sudweeks, WSBA #28755

Daniel J. Stein, WSBA #48739

16400 Southcenter Parkway, Suite 410

Tukwila, WA 98188

Email: jstein@condodefects.com

Email: justin@condodefects.com

Email: dstein@condodefects.com

Telephone: (206) 388-0660

1 Facsimile: (206) 286-2660

2 *Attorneys for Plaintiff*

3 **REED MCCLURE**

4 /s/ Michael S. Rogers

5 Michael S. Rogers, WSBA #16423

6 1215 Fourth Avenue, Suite 1700

7 Seattle, WA 98161-1087

8 Phone: (206) 292-4900

9 mrogers@rmlaw.com

10 *Attorney for Defendant*

ORDER

Based on the above stipulation, IT IS SO ORDERED that the deadlines set forth in the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. #4) are extended as follows:

	New Deadline
Deadline for FRCP 26(f) Conference	07/03/2025
Initial Disclosures Pursuant to FRCP 26(a)(1)	07/18/2025
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	07/25/2025

DATED THIS 9th day of June, 2025.



JOHN H. CHUN
UNITED STATES DISTRICT JUDGE